

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**BALTIMORE DIVISION**

JASON ALFORD, DANIEL LOPER, WILLIS  
MCGAHEE, MICHAEL MCKENZIE, JAMIZE  
OLAWALE, ALEX PARSONS, ERIC SMITH,  
CHARLES SIMS, JOEY THOMAS, and LANCE  
ZENO, Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

vs.

THE NFL PLAYER DISABILITY & SURVIVOR  
BENEFIT PLAN; THE NFL PLAYER  
DISABILITY & NEUROCOGNITIVE BENEFIT  
PLAN; THE BERT BELL/PETE ROZELLE NFL  
PLAYER RETIREMENT PLAN; THE  
DISABILITY BOARD OF THE NFL PLAYER  
DISABILITY & NEUROCOGNITIVE BENEFIT  
PLAN; LARRY FERAZANI; JACOB FRANK;  
BELINDA LERNER; SAM MCCULLUM;  
ROBERT SMITH; HOBY BRENNER; and  
ROGER GOODELL,

Defendants.

**Case No. 1:23-cv-00358-JRR**

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION TO COMPEL DISCOVERY**

Plaintiffs having filed a motion, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Rule 104.8 of the Local Rules of this Court, to compel Defendants to produce all documents responsive to Requests Nos. 2 and 3 of Plaintiffs' First Set of Requests to Defendants for Production of Documents ("Requests 2 & 3"); the motion having been fully briefed; and the Court having considered the motion, the motion is hereby GRANTED.

1. Defendants' objections to Requests 2 & 3 are hereby OVERRULED.
2. Defendants are directed to produce all documents responsive to Requests 2 & 3

within \_\_\_\_\_ days of this Order.

IT IS SO ORDERED.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 202\_

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JULIE R. RUBIN  
United States District Judge